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October 12, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

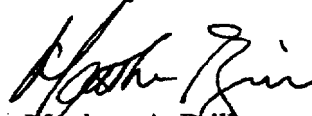
Re: *Petition of Qwest Corporation for Clarification or, in the Alternative,  
Reconsideration, CC Docket No. 98-147*

Dear Ms. Salas:

Enclosed for filing is the original version of the Declaration of Georganne Weidenbach, which was filed electronically using the Commission's Electronic Comment Filing System, on October 10, 2000.

Please file-stamp the additional copy provided and return it with our messenger. Thank you.

Sincerely,

  
Matthew A. Brill

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List A B C D E

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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**OCT 12 2000**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matters of	)	
	)	
Deployment of Wireline Services Offering	)	CC Docket No. 98-147
Advanced Telecommunications Capability	)	
	)	
and	)	
	)	
Implementation of the Local Competition	)	CC Docket No. 96-98
Provisions of the Telecommunications	)	
Act of 1996	)	

**Declaration of Georganne Weidenbach**

1. My name is Georganne Weidenbach. I am employed by Qwest Communications International as a Network Planner, Strategist and Negotiator in the Technical Regulatory Interconnection Planning group. From 1996 to 1998, I served as the Lead Project Manager for Collocation and Interconnection for U S WEST, Inc., before the merger of Qwest and U S WEST.

2. I have held numerous positions with Qwest and U S WEST, including managing the Design Services installation and repair dispatch center for the Local Network Organization. I have extensive Marketing, Public Policy and Engineering background, including the development of written methods and procedures for Design Services and Collocation applications.

3. I hold a Bachelor of Science degree in business from Regis University at Denver.

4. I have reviewed the FCC's recent Collocation Order, and believe that the Order is deficient in three important respects:

1) **Forecasting** — The Order fails to require CLECs to provide, or to permit ILECs to require CLECs to provide, timely and accurate forecasts of their collocation requirements. It instead leaves the issue of forecasting to each individual state. Forecasts are absolutely crucial in orderly administration of collocation provisioning.

2) **Adjacent Collocation** — The Order, in rule §51.323(l), establishes a 90-day interval for Adjacent Collocation. Such a requirement is not supported by record evidence or the text of the Order, nor is a 90-day interval a reasonable requirement, given the work required.

3) **Reconditioning of Space** — The Order requires incumbent LECs to complete the reconditioning of space as a part of the 90 day interval. This is an unreasonable requirement, given the amount of work required to recondition space, particularly since the FCC has not required CLECs to provide a forecast of their collocation requirements.

I will address each of the above issues in the following sections of this affidavit.

5. **Forecasting.** To achieve the 90-day intervals established in the Order for caged or cageless physical collocation, it is critical that incumbent LECs obtain accurate and timely forecasts from CLECs. Such forecasts are required to determine if sufficient space is available, and to pre-provision such infrastructure as power, air conditioning, lighting, and to recondition office space or remove unused, obsolete equipment if required. Such pre-provisioning is necessary, since such infrastructure cannot be completed within the 90-day interval between the receipt of an application by a CLEC and the turnover of space by Qwest.

6. For example, Qwest has approximately 1,400 central office locations, but more than two-thirds of these central offices have no collocation. Without forecasts, Qwest cannot reasonably be expected to predict when and if a request for collocation will arrive at one of the more than 900 central offices where no collocation has yet been

requested. Nor can Qwest be expected to accurately predict the specific power, space, and air conditioning needs for the collocation request of such a future CLEC application. As a result, it is unreasonable to require Qwest to pre-provision the space, power, air-conditioning, and other infrastructure in these locations for the possible arrival of a collocator at some point in time in the future.

7. Forecasts are also an important tool in the hiring, training, and deployment of work force engaged in the various stages of collocation – including feasibility studies, quotation development, and construction.

8. **Adjacent Collocation.** Adjacent collocation is required when space for physical collocation has been exhausted at a particular premise. In the context of an exhausted central office building, it is unreasonable to expect the construction of an adjacent structure (such as a building addition, controlled environmental vault, or other structure) within the 90-day interval. Because the Order grants CLECs the right to construct the adjacent structure, a typical process will involve first determining the amount of space required by the CLEC, a review of the plans for the site, including future construction plans, parking requirements, hoisting areas, existing cable vaults and cable runs. Once a general design has been established, a more detailed design must be prepared, and often bids will be required from multiple general contractors. Building permits may also be required from the local governmental agency. Actual construction of the adjacent structure, once permits have been obtained and a contractor is selected will also often require several months for excavation, drainage, construction of the structure, and the supporting infrastructure (power, lighting, etc.). Completion of all of this work, as well as the work required to permit the incumbent LEC to terminate the associated DC

Power, and tie cables to the network, cannot generally be completed in a 90-day interval. This is particularly unreasonable, as the FCC has granted to the CLEC the right to complete the majority of this work for adjacent collocation.

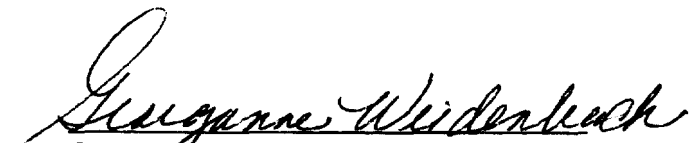
9. **Reconditioning of Space.** Reconditioning of space is required when a central office building has exhausted space, but the same central office has available administrative space that may be converted to central office space. Such conversion of administrative space to central office space is referred to as reconditioning space. A typical administrative space contains carpeted floors, desks, suspended ceilings, and associated lighting fixtures. Conversion of this space typically involves the hiring of an architect, who prepares drawings and detailed specifications, for the removal of the carpeting, ceiling, lighting fixtures, etc. as well as the construction of the new floor, the installation of new lighting fixtures, the installation of new electrical outlets, and the construction of new air conditioning venting (and cooling capacity, if required).

10. Once the specifications are completed, the drawings and specifications are submitted to general contractors through a request for bids, depending on the size of the job. Once the contractor is selected, the construction can begin.

11. All of the above generally require substantially more than 90 days for completion.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed this 10 day of October, 2000.

  
Georganne Weidenbach